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JUAN CARLOS MARTINEZ CASTRO

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:19-cr-233 TLN
)
Plaintiff,) STIPULATION AND PROPOSED ORDER TO
) CONTINUE STATUS CONFERENCE, AND TO
vs.) EXCLUDE TIME
)
JUAN CARLOS MARTINEZ) Date: December 9, 2021
CASTRO,) Time: 9:30 a.m.
Defendant.) Judge: Hon. Troy L. Nunley
)
)

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, U.S. Attorney McGregor Scott, through Assistant United States Attorney Justin Lee, attorney for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hannah Labaree, attorney for defendant Juan Carlos Martinez Castro, and Christopher Cosca, attorney for defendant Shannon Jeffries, that the previously-scheduled status conference date of December 9, 2021, be vacated and the matter be set for status conference on July 21, 2022 at 9:30 a.m, at the defendants' request.

The purpose of this request is to allow for continuity of counsel for Mr. Castro, as well as to allow for sufficient time to review and investigate case materials, and to review discovery with each respective client. Further, defense counsel for Mr. Castro will be out on extended medical leave until July 2022.

Mr. Castro is out of custody on Pretrial Release and is in full compliance with his conditions. Ms. Jeffries is in custody at the Sacramento County Jail.

1 For all these reasons, Defense counsel believe that the failure to grant the above-
2 requested continuance would deny them the reasonable time necessary for effective preparation,
3 taking into account the exercise of due diligence.

4 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
5 excluded from this order's date through and including July 21, 2022, pursuant to 18 U.S.C.
6 §3161 (h)(7)(A)and (B)(iv) (reasonable time to prepare), and General Order 479, Local Code T4,
7 based upon continuity of counsel and defense preparation.

8 Counsel and the defendant also agree that the ends of justice served by the Court granting
9 this continuance outweigh the best interests of the public and the defendant in a speedy trial.

10 Respectfully submitted,

11 Dated: December 3, 2021

HEATHER E. WILLIAMS
Federal Defender

12 */s/ Hannah Labaree*
13 HANNAH LABAREE
14 Assistant Federal Defender
15 Attorney for Defendant
Juan Carlos Martinez Castro

16 Dated: December 3, 2021

17 */s/Christopher Cosca*
18 CHRISTOPHER COSCA
19 Attorney for Defendant
Shannon Jeffries

20 Dated: December 3, 2021

21 MCGREGOR SCOTT
22 United States Attorney

23 */s/Justin Lee*
24 JUSTIN LEE
25 Assistant U.S. Attorney
26 Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its Order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Further, the continuance is necessary to maintain continuity of counsel. Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date of this order, up to and including July 21, 2022, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the December 9, 2021 status conference shall be continued until July 21, 2022, at 9:30 a.m.

DATED: December 3, 2021

Troy L. Nunley